

The Honorable Benjamin H. Settle

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
TACOMA DIVISION

DAKOTA ROBERTS and DAWN MARIE  
HACKER, individually and on behalf of all  
persons similarly situated,

Plaintiffs,

v.

SIDWELL AIR FREIGHT, INC. and DHL  
EXPRESS (USA) INC., d/b/a DHL EXPRESS,

Defendants.

No. 3:21-cv-05912-BHS

DHL'S AMENDED UNOPPOSED  
MOTION FOR EXTENSION OF TIME  
TO FILE RESPONSE TO PLAINTIFFS'  
MOTION FOR CONDITIONAL  
CERTIFICATION

NOTE ON MOTION CALENDAR:  
AUGUST 8, 2022

Defendant DHL EXPRESS (USA) INC. ("DHL") hereby files its Amended Unopposed Motion for Extension of Time to File Response to Plaintiffs' Motion for Conditional Certification and would show as follows:

1. Plaintiffs filed their Motion for Conditional Certification and Judicial Notice and Equitable Tolling ("Plaintiffs' Motion") on July 15, 2022.
2. DHL's Response to Plaintiffs' Motion is due on August 8, 2022.

UNOPPOSED MOTION FOR EXTENSION OF  
TIME TO FILE RESPONSE TO PLAINTIFF'S  
MOTION FOR CONDITIONAL CERTIFICATION  
[NO. 3:21-CV-05912-BHS] - 1

SEYFARTH SHAW LLP  
999 Third Avenue  
Suite 4700  
Seattle, WA 98104-4041  
(206) 946-4910

3. DHL previously filed its Unopposed Motion for Extension of Time to File Response to Plaintiffs' Motion for Conditional Certification on August 3, 2022 (Dkt. #33). DHL now files this amended motion to include the date to be noted for consideration.

4. Plaintiffs' counsel is unopposed to the relief requested in this motion.

Dated this 8th day of August, 2022.

Respectfully submitted,

By: s/ Linda C. Schoonmaker  
Linda C. Schoonmaker (pro hac vice)  
Texas Bar No. 17806300  
SEYFARTH SHAW LLP  
700 Milam, Suite 1400  
Houston, Texas 77002  
Telephone: (713) 225-2300  
Facsimile: (713) 225-2340  
Email: lschoonmaker@seyfarth.com

s/ Andrew R. Escobar  
Andrew R. Escobar, WSBA No. 42793  
999 Third Avenue, Suite 4700  
Seattle, Washington 98104  
Phone: (206) 946-4910  
Email: aescobar@seyfarth.com

**ATTORNEY FOR DEFENDANT  
DHL EXPRESS (USA) INC.**

**CERTIFICATE OF CONFERENCE**

I, Linda C. Schoonmaker, hereby certify that on August 2, 2022, I conferred with Plaintiffs' counsel, Camille Fundora Rodriguez, regarding this motion and she is unopposed to this motion.

s/ Linda C. Schoonmaker  
Linda C. Schoonmaker

UNOPPOSED MOTION FOR EXTENSION OF  
TIME TO FILE RESPONSE TO PLAINTIFF'S  
MOTION FOR CONDITIONAL CERTIFICATION  
[NO. 3:21-CV-05912-BHS] - 2

SEYFARTH SHAW LLP  
999 Third Avenue  
Suite 4700  
Seattle, WA 98104-4041  
(206) 946-4910